

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

NICOLE HARRIS, )  
Plaintiff, )  
v. ) No. 14-cv-4391  
CITY OF CHICAGO, *et al.* ) Judge John W. Darrah  
Defendants. )

**TABLE OF CONTENTS TO EXHIBITS IN SUPPORT OF  
PLAINTIFF'S LOCAL RULE 56.1(b)(3)(C) STATEMENT  
OF ADDITIONAL FACTS REQUIRING DENIAL OF  
THE CITY'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

<u>No.</u>	<u>Exhibit</u>
Exh 1	May 15, 2005 General Progress Report ("GPR") of Diante Dancy Interview, by Defendant Wo, CITY1218-129.
Exh. 1a	May 15, 2005 GPR re: Diante Interview, by Defendant Wo with the Word " <b>DRAFT</b> " marked across the face of the document, CITY1220-21.
Exh. 2	May 16, 2005 Interview Note by DCFS Child Protection Investigator Karen Wilson, DCFS36.
Exh. 3	Transcript Excerpts of April 11, 2006 and April 15, 2006 interviews of Diante Dancy, conducted by Dr. Robert Galatzer-Levy.
Exh. 4	May 14, 2005 Field Investigation Report, by Officer Hector Lopez, CITY394-95.
Exh. 5	Deposition Excerpts of Defendant John Day.
Exh. 6	Deposition Excerpts of Plaintiff Nicole Harris.
Exh. 7	Deposition Excerpts of Sta-Von Dancy.
Exh. 8	May 14, 2005 GPR, by Defendant Wo, CITY414-15.
Exh. 9	Detective Division Standard Operating Procedures, Excerpts, CITY160, 246.
Exh. 10	Expert Report of Plaintiff's Expert Gregg McCrary.
Exh. 11	City's Response to Plaintiff's First Set of RTAs – Resp. No. 3.

Exh. 12 Deposition Excerpts of Defendant Demosthenes Balodimas.

Exh. 13 Deposition Excerpts of Defendant Randall Wo.

Exh. 14 May 15, 2005 GPR of “First Confession,” by Defendant Landando, CITY399.

Exh. 15 May 15, 2005 GPR of “Recantation,” by Defendant Noradin, CITY421.

Exh. 16 Deposition Excerpts of Defendant Anthony Noradin.

Exh. 17 Expert Report of Plaintiff’s Expert Charles Honts.

Exh. 18 May 14, 2005 GPR, by Defendant Kelly, CITY412-413.

Exh. 19 Deposition Excerpts of Defendant James Kelly.

Exh. 20 Deposition Excerpts of Defendant Robert Cordaro.

Exh. 21 June 21, 2005 Cleared & Closed Supplementary Report, by Defendants Wo, Day, Noradin, and Balodimas.

Exh. 22 City’s Second Supplemental Amended Response to Plaintiff’s Third Set of Requests to Admit.

Exh. 23 June 17, 2013 Circuit Court of Cook County Proceedings, PL Nicole Harris 5141-46.

Exh. 24 Nicole Harris’s Certificate of Innocence, PL Nicole Harris 9677.

Exh. 25 Group Exhibit: CPD procedures for the Polygraph Unit: CITY1455-61, 1447-50, 8551-58, 8559-66.

Exh. 26 Deposition Excerpts of City’s 30(b)(6) Deponent James Hickey.

Exh. 27 Nov. 10, 2015 Statements to the Court by City’s lead attorney John Gibbons

Exh. 28 City’s Verified Third Resp. to Plaintiff’s First Set of Interrogatories – Resp. No. 4.

Exh. 29 Expert Report of Plaintiff’s Expert Richard Leo.

Exh. 30 Deposition Excerpts of Defendant Robert Bartik.

Exh. 31 Deposition Excerpts of Defendant Robert Bartik from *McGee v. City of Chicago*, N.D. Ill. Case No. 04 CV 6352.

Exh. 32 Deposition Excerpts of City’s 30(b)(6) Deponent Donald O’Neill.

Exh. 33 Group Exhibit: Bartik performance reviews, CITY8099-8109.

Exh. 34 Plaintiff's summary chart regarding CPD's scattered locations of records of officers' performance.

Exh. 35 March 10, 2013 *Chicago Tribune* article regarding issues with the Polygraph Unit.

Exh. 36 City's Responses to Plaintiff's Amended Third Set of Requests to Admit.

Exh. 37 City's Verified Response to Plaintiff's Second Set of Interrogatories – Resp. No. 1.

Exh. 38 Plaintiff's chart of 42 cases in which CPD obtained a "confession" that was later proven to be false and/or fabricated and for which defendant was fully exonerated.

Exh. 39 Harris's April 29, 2015 Response to City's Second Set of Interrogatories – No. 1.

Exh. 40 City's Supplemental Response to Amended Second Set Requests to Admit.

Exh. 41 Sept. 28, 1990 Goldston and Sanders' Office of Professional Standards Investigative Report.

Exh. 42 December 9, 2015 Mayor Rahm Emanuel Address to City Council.

Exh. 43 December 8, 2015 Mayor Rahm Emanuel Interview on WTTW's *Chicago Tonight* (available at <http://chicagotonight.wttw.com/2015/12/08/mayor-emanuel-police-reform-accountability>, last visited 3/14/16) (copyright-protected CD to Court only).

Exh. 44 2001 CPD Annual Report.

Exh. 45 2002 CPD Annual Report.

Exh. 46 2003 CPD Annual Report.

Exh. 47 2004 CPD Annual Report.

Exh. 48 2005 CPD Annual Report.

Exh. 49 Deposition Excerpts of Defendant Michael Landando

Exh. 50 December 2001 *Chicago Tribune* series of articles entitled Cops and Confessions.

Exh. A UNDER SEAL List of individuals from whom Bartik claims to have obtained 144 pre-test confessions, DEF911.